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I appreciate the opportunity to comment on the NOSB-AWG Interim Final Report because “organic” seafoods are currently being sold in Missouri markets from foreign producers and local producers are unable to compete with this “organic” label.

Having reviewed the Interim Final Report, I think this will provide an opportunity for trout farmers to develop niche markets for their product. The standards are set quite high, but having a reasonable program will at least allow the industry to attempt to compete with imports.

I do have some concerns. Fish and aquatic animals are different than terrestrial animals and the organic standards need to recognize this. Trout and most fish require fish meal and fish oil in their diets and therefore a realistic amount should be allowed. Stocking densities vary from different species of fish. Many fish species to include rainbow trout are behaviorally well-suited for high densities. Higher densities can be compatible with organic fish farming.

I believe that reasonable organic market standards can open a niche market for fish farmers; therefore allowing them to compete with foreign imports. I urge the National Organic Standards Board to pursue rulemaking on the report as soon as possible.

Sincerely,

Marvin E. Emerson